435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

RECEIVED

FEB 2 8 2001

	Environment		
Part A – To Be Completed By Observer		Environmental Cleanup Office	
1.	Person Initiating Report: Robert G. Akins	Phone: 526-7253	
	Contractor WAG Manager: Frank L. Webber	Phone: 526-8507	
2.	Site Title: PBF-34; Abandoned Debris Located near the MWSF.		
3.	Describe the conditions that indicate a possible inactive or unreporte		

condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

Several pieces of broken Transite (trade name for a mixture of asbestos and concrete) pipe were identified at a location approximately 150 feet west of the MWSF at PBF (see map – Figure 1). The broken pieces of piping are lying on the ground. (see attached photos). Samples of the piping were submitted for analysis at the INEEL IH Lab, and were found to be non-friable. A radiological survey was conducted, and all beta-gamma scans were <100 counts per minute (cpm) above background, with no detectable alpha contamination. The site appears to be disturbed, since it has been leveled and replanted with crested wheatgrass.

The possibility exists that there may be additional Transite piping buried beneath the soil, in addition to those pieces visible at the surface. However, the material exposed at the surface has been determined to be non-friable, and does not present evidence of a release to the environment.

Part B – To Be Completed By Contractor WAG Manager

- 4. Recommendation:
 - This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.

 WAG: 10

 Operable Unit: 10-08
 - This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.
- 5. Basis for the recommendation:

This abandoned debris site meets the requirements to be classified an inactive waste site since the Transite material could potentially pose a risk to human health or the environment for the following reasons:

- 1. Source description: The source of the Transite pieces is unknown and there is evidence that it has been disturbed several times.
- 2. Exposure pathways: There are not any exposure pathways because the Transite is not friable.
- 3. Potential contaminants of concern: Non-friable transite is the only potential contaminant of concern.
- 4. Possible interfaces: Possible interfaces include the PBF facility operations and the INEEL Asbestos Abatement Program.

There is no evidence of hazardous constituents being released at this site, however, there is a potential for more fragments to be found below the ground surface.

This site meets the requirements for an inactive waste site, requires investigation and should be included in the FFA/CO

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

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NEW SITE IDENTIFICATION

	Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete, My recommendation is indicated in Section 4 above.				
Nam		Signature: Kunh			

NEW SITE IDENTIFICATION

Part C – To Be Completed By INEEL FFA/CO WAG Managers						
7. WAG Operable Unit:						
DOE WAG Manager's Concurrenc	e: X Concur with recommendation	. Do not concur with the recommendation.				
Signature: Carol Q A	tathoway	·				
Date:	<i>/</i>					
EPA WAG Manager's Concurrence	e: 💢 Concur with recommendation	. Do not concur with the recommendation.				
Signature:	28~					
Date: 3/6/01						
State of Idaho WAG Manager's Co	ncurrence: Concur with recommendation	. Do not concur with the recommendation.				
Signature: Led Line	· · · · · · · · · · · · · · · · · · ·					
Date: 3/13/01						
Explanation follows:						
	,					
Part D – To Be Completed By The	INEEL FFA/CO Responsible Program I	Managers (RPM's)				
8. FFA/CO RPM's Concurrence:						
		•				
For DOE-ID						
Name: Kathleen Hain Signature:	Vattloen Etain Date: 2 /21 / 01	_ 🔀 Concur				
For EPA Region X		☐ Do not concur. Explanation follows:				
Name: Wayne Pierre Signature:	My CCC Date: 3/7/0/	Concur				
For State of Idaha	× '	☐ Do not concur. Explanation follows:				
For State of Idaho Name: Dean Nygard Signature:	Dary 2. Had Date: 3/13/ 0	✓ 🔽 Concur				
	22-y	Do not concur. Explanation follows:				



Timothy L Carlson/TCL/CC01/INEEL/US@INEL, Robert G Akins/RG2/CC01/INEEL/US@INEL,

Doug S Vandel/DSV/CC01/INEEL/US@INEL

CC:

Subject: FW: Fact Sheet Abandoned Trench at WROC

FYI

-- Forwarded by Douglas H Preussner/DPRES/CC01/INEEL/US on 11/13/2000 08:56 AM

From:

Carol A Hathaway@Exchange on 11/13/2000 08:21 AM

To:

Christine Hiaring/HRG/CC01/INEEL/US@INEL, "Koch, Daryl" <DKoch@DEQ.state.ID.US>@SMTP@Exchange, "Livieratos, Ted" <tliviera@deq.state.id.us>@SMTP@Exchange, "Poeton, Rick" <Poeton.Rick@epamail.epa.gov>@SMTP@Exchange, Douglas H

Preussner/DPRES/CC01/INEEL/US@INEL, Frank L Webber/FLW/CC01/INEEL/US@INEL

CC:

Subject: FW: Fact Sheet Abandoned Trench at WROC

fyi

----Original Message---

From:

Hain, Kathleen E

Sent:

Monday, November 13, 2000 8:17 AM

To:

Hathaway, Carol A

Subject:

FW: Fact Sheet Abandoned Trench at WROC

----Original Message----

From:

Rasch, Donald N

Sent:

Thursday, November 09, 2000 2:40 PM

To:

Russell, Ralph W; Wessman, David L; Woolf, Stephanie A

Cc:

Hain, Kathleen E

Subject:

FW: Fact Sheet Abandoned Trench at WROC

FYI

----Original Message----

From:

Hernandez, Nicole K

Sent:

Thursday, November 09, 2000 10:06 AM

To:

Rasch, Donald N

Subject:

RE: Fact Sheet Abandoned Trench at WROC

Don, just sent you the photos and another message that includes some information, which is still not very much. Here is the fact sheet that I sent out.



Trench-WROC.doc

Thanks Nicole

---Original Message---

From:

Rasch, Donald N

Sent:

Thursday, November 09, 2000 10:03 AM

To:

Hernandez, Nicole K

Subject:

FW: Fact Sheet Abandoned Trench at WROC

Nicole: Would you send me the photos and a description of what the issue is? Thanks, Don

Sent:

Thursday, November 09, 2000 8:14 AM

To:

Rasch, Donald N

Subject:

FW: Fact Sheet Abandoned Trench at WROC

saw that Teresa is out.

-Original Message-From:

Bergholz, Warren E

Sent:

Thursday, November 09, 2000 8:13 AM

To:

Hernandez, Nicole K

Cc:

Beausoleil, Geoffrey L; Fritz, Lori L; Perkins, Teresa L; Green, Lisa A; Bowman, Gerald C

Subject:

RE: Fact Sheet Abandoned Trench at WROC

Thanks, Nicole. Any idea how long the trenches had been there?

-Original Message----

From:

Hernandez, Nicole K

Sent:

Wednesday, November 08, 2000 9:52 AM

To:

! Factsheet-DOEID

Cc:

Caummisar, Richard C; Must, Thomas L

Subject: Fact Sheet Abandoned Trench at WROC

The attached is a Fact Sheet regarding an abandoned trench identified at WROC which contains various waste materials. Please call me if you have any questions.

<< File: Abandoned Trench-WROC.doc >>

Nicole K. Hernandez DOE-ID Facility Representative RWMC/WROC Phone 6-8949 Pager 7570

Fact Sheet

Date: 11/8/00

To: Distribution

From: Nicole K. Hernandez, Facility Representative

Radioactive Waste Management Complex (RWMC)/Waste Reduction Operations

Complex (WROC)

Subject: Abandoned Trench

Summary Tuesday Rosa

On Thursday, 11/7/00, the RWMC Facility Representative was notified that an abandoned trench containing discarded material was discovered within the fenced area at WROC. The area included 2 sites. The first debris site is located to the satisfyest of the MWSF. This area contained several pieces of broken transite material. The second debris site was located approximately 200 yards north-northeast of the MSWF. This debris site consisted of a trenched area approximately 160' long by 10' wide. The trenched excavation appeared to be approximately 5' in depth. The material located within the trench mainly consisted of construction debris (i.e. broken concrete slab and block, metal pipe material, 55-gallon drums, gas cans, and misc. scrap metal debris); however, evidence of damaged/broken transite pipe debris and a panel of fiberglass insulation with a black asphalt type backing were noted within the debris filed. It appears that the trenches have not been used for several years.

BBWI Environmental Affairs (EA) personnel made a determination that the transite material is classified as a Category II nonfriable asbestos-containing cementous product which has historically been utilized for duct insulation, pipe construction, and siding. Due to mechanical damage and exposure to weather the transite debris located in the trench has been rendered friable. The reportable quantity for friable asbestos is one pound. The quantity observed in the trench was determined to be greater than 1 pound.

<u>Actions Taken</u>

- 1. Management and environmental support were notified.
- 2. Environmental support investigated the area to determine reportability requirements.
- 3. The Spill Notification Team was notified to ensure the proper reports were made.
- 4. DOE-ID and DOE-HQ personnel were notified of the event on 11/7/00. The event was categorized as an Unusual Occurrence Group 2.C (1) Environmental Hazardous Material Contamination.
- 5. Industrial Hygiene has been contacted to perform an investigation of the area on 11/8/00 to affirm the EA determination that the material found is friable asbestos-containing material.

Safety Significance

The improper disposal of waste has regulatory implications and potential environmental impact.



Robert G Akins/RG2/CC01/INEEL/US@INEL

CC:

Subject:

Asbestos Rad Survey

(West of the MWSF) Attached is the revised e-mail indicating that the asbestos pipe fragments found at site were non-rad. Troy surveyed all of the pieces found on the surface. The asbestos was also declared non-friable because there were no really weathered, thin pieces like those located at the trench. If you need additional information, give me a call......Dean

Forwarded by Dean L Roberts/ROBEDL/CC01/INEEL/US on 11/20/2000 12:35 PM

Troy B Terry 11/20/2000 12:28 PM

To:

Dean L Roberts/ROBEDL/CC01/INEEL/US@INEL

CC:

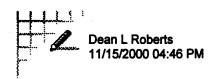
Lisa A Ruiz/LAR2/LMITCO/INEEL/US@INEL

Subject:

Dean, When I went down to the newly found asbestos dump site (that is just north safet of MWSF) with you, I surveyed the asbestos that you had pointed out and approximately 20% of the other items in the trench. All direct scans with the Eberline 2A #800999 were <100cpm above bkg, and no detectable alpha above bkg with the Electra #801758.

Also at site (which is just regy/west of MWSF) I surveyed 100% of the asbestos pipe and fragments. All direct scans were <100cpm above bkg with 2A and no detectable alpha with the Electra.

It is my recomendation that if anyone is to dig up or move any of the debris, have an RCT with you to check out the item and the area. Just in case there is something buried that I did not detect. RCT--Troy Terry.



Nicole K Hemandez@Exchange

CC:

Timothy L Carlson/TCL/CC01/INEEL/US@INEL, Robert G Akins/RG2/CC01/INEEL/US@INEL,

Brian M Roethlisberger/ROETBM/CC01/INEEL/US@INEL, Jeff J

Riedesel/ZJJ/CC01/INEEL/US@INEL

Subject: Schedule for Removal of Transite From Locations Near PER-613

Following is the schedule for removal of the transite found near PER-613:

The work control form is being prepared at CFA. Following preparation of the WCF it will then be reviewed. The preparation of the WCF and review will take a week or maybe a little longer. This includes walking down the job.

When the WCF is finalized and the job walked down, the Functional Asbestos Team will remove the transite from the locations. Actual removal of the transite will only take a couple of hours. The bagged transite will be placed in approved asbestos container. Ultimately the asbestos will be disposed of in the asbestos landfill.

Source for the funding of the removal is being researched now.

With the snow cover, there is no potential for release of asbestos to the atmosphere. This is our best estimate for now. If you need additional information, give me a call at 6-7943.



Frank L Webber/FLW/CC01/INEEL/US@INEL

CC:

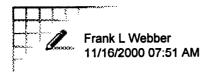
Douglas H Preussner/DPRES/CC01/INEEL/US@INEL, Christine

Hiaring/HRG/CC01/INEEL/US@INEL, Robert G Akins/RG2/CC01/INEEL/US@INEL

Subject: Re: Schedule for Removal of Transite From Locations Near PER-613

yes, the asbestos program can go ahead and remove any/all asbestos containing materials. If/when it becomes a new site (after we submit the NSI form, and it gets approved by all the necessary signatures) - then we will want to note that the asbestos removal was done, since that fact provides a hint that there might be more asbestos material lurking underneath or nearby. But it is okay to have the transite pipe picked up and taken away (properly following all work control processes and safety precautions, of course!)

Frank L Webber



To:

Katherine M Davis/DAVIKM/CC01/INEEL/US@INEL

CC:

Douglas H Preussner/DPRES/CC01/INEEL/US@INEL, Christine

Hiaring/HRG/CC01/INEEL/US@INEL, Robert G Akins/RG2/CC01/INEEL/US@INEL, Dean L

Roberts/ROBEDL/CC01/INEEL/US@INEL

Subject: Schedule for Removal of Transite From Locations Near PER-613

Since this is a new potential CERCLA site is the facility allowed to just go remove the transite pipe or do we have to wait for the process? I've heard rumors that if it is just Asbestos then it can be removed. Please advise.

------Forwarded by Frank L Webber/FLW/CC01/INEEL/US on 11/16/2000 07:58 AM

Robert G Akins 11/15/2000 05:22 PM

To:

Frank L Webber/FLW/CC01/INEEL/US@INEL, Christine Hiaring/HRG/CC01/INEEL/US@INEL,

Douglas H Preussner/DPRES/CC01/INEEL/US@INEL, Richard P

Wells/WELLRP/CC01/INEEL/US@INEL, Harold L Thorne/HLT/CC01/INEEL/US@INEL, Katherine

M Davis/DAVIKM/CC01/INEEL/US@INEL, John F Marthis/JFM4/CC01/INEEL/US@INEL

CC:

Subject: Schedule for Removal of Transite From Locations Near PER-613

For your information. Bob

- Forwarded by Robert G Akins/RG2/CC01/INEEL/US on 11/15/2000 05:18 PM

Dean L Roberts 11/15/2000 04:46 PM

To:

Nicole K Hernandez@Exchange

CC:

Timothy L Carlson/TCL/CC01/INEEL/US@INEL, Robert G Akins/RG2/CC01/INEEL/US@INEL,

Brian M Roethlisberger/ROETBM/CC01/INEEL/US@INEL, Jeff J

Riedesel/ZJJ/CC01/INEEL/US@INEL

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Source for the funding of the removal is being researched now.

With the snow cover, there is no potential for release of asbestos to the atmosphere. This is our best estimate for now. If you need additional information, give me a call at 6-7943.



Robert G Akins/RG2/CC01/INEEL/US@INEL

CC:

Subject: Site (near MWSF) coords

Here you go Bob. I have attached all the maps I have made. The coordinates for the, near MWSF, site we located last week;

Easting: 315822.448 Northing: 683798.412 Elevation: 4988.991

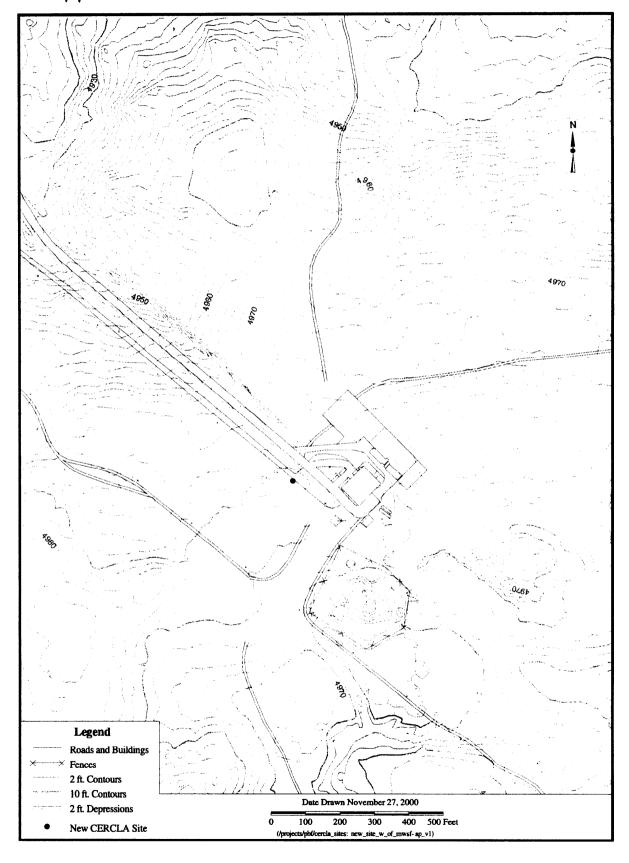
Projection STATE PLANE, IDAHO EAST (zone 3701), U.S. SURVEY FEET, Horizontal Datum NAD27, Vertical Datum NGVD29

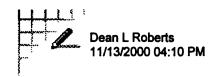
Let me know if you need anything else.

Dan

new_site_w_of_mwsf-ap_v

Abandoned Debris Located Approx. 150 ft. West of the MWSF





Robert G Akins/RG2/CC01/INEEL/US@INEL

CC:

Nicole K Hernandez@Exchange

Subject: Additional Photos of the Construction Material Disposal Trench

Attached are photos taken from the trench back to the Mixed Waste Storage Facility (PER-613) and the other site that was referred to in the memo.

Photos 2-1 and 3-1 are taken looking from the trench back to PER-613.

Photo 4-1 is another picture of the transite.

- ✓ Photos 5-1 and 6-1 are of the transite fragments taken at the site west of PER-613
- ✓ Photos 7-1 and 8-1 are taken from the transite fragments site looking back to PER-613.

There was still a lot of snow that made it difficult to see the fragments at the other site. The site has been disturbed because you can tell it has been leveled and replanted with crested wheatgrass. I have not been able to find any information about the trench site. No one has any idea about how old it may be, however, based upon the size of the sagebrush, the site has not been disturbed in at least the last 20 years, probably longer. If you need any other information, give me a call......Dean